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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ERIC BECKMAN, STEVE BUNCH, JERI
GRIFFIN, IVANA HARRINGTON, JACK
LEIVA, TERI PARKE, THOMAS WALKER,
PETE WISEMAN, RENEE BRAUN,
ELIZABETH SCOTT, VERONICA
MORGAN, and THERESA FORREST,
individually and on behalf of all others
similarly situated,

                         Plaintiffs,

      v.

KEYBANK, N.A.,

                         Defendant.

No. 12 Civ. 7836 (RWS) (RLE)

NOTICE OF PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs'

Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, and in the

Declaration of Justin M. Swartz in Support of Plaintiffs' Motion for Approval of

Attorneys' Fees and Reimbursement of Expenses and Motion for Approval of Class

Representative Service Awards and the supporting exhibits attached thereto, Plaintiffs

respectfully request that the Court enter an Order:

(1)   awarding Class Counsel attorneys' fees of 33% of the Settlement Fund

($1,617,000);

(2)   awarding Class Counsel $38,928 in expenses; and

(3)   granting such other, further, or different relief as the Court deems just and

proper.

Dated: March 4, 2013
       New York, New York

                                        Respectfully submitted,
                                        OUTTEN & GOLDEN LLP
                                        By:

                                        /s/ Justin M. Swartz
                                        Justin M. Swartz
                                        OUTTEN & GOLDEN LLP
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                                        Attorneys for Plaintiffs and the Class

2